



Drohan Lee

February 6, 2024

Tomorrow's conference will proceed as scheduled because the parties did not provide any explanation as to why they marked every single field on the proposed Case Management Plan as "N/A." In addition, the parties should be aware that the briefing deadlines outlined below will not be moved due to ongoing settlement discussions.

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

SO ORDERED.

Arun Subramanian, U.S.D.J.

Date: February 6, 2024

Re: *G.L., et al., v. N.Y.C. Dep't of Educ. et al.*, 23-CV-09395 (AS)

Dear Judge Subramanian,

We represent Defendants in the above-referenced action, wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

Defendants write, with Plaintiff's consent, pursuant to Your Honor's Order dated February 2, 2024. [Dkt. No. 11]. We respectfully request that the Court adjourn the Initial Conference currently scheduled for February 7, 2024 *sine die*. In addition, pursuant to the Court's Individual Practices, we attach a proposed Civil Case Management Plan and Scheduling Order.

Pursuant to the Court's direction the parties hereby propose the following briefing schedule should the matter not be resolved.

- Plaintiffs motion for summary judgment will be due on or before April 5, 2024;
- Defendant's opposition will be due on or before May 6, 2024;
- Plaintiff's reply is due May 29, 2024.

The parties thank the Court for considering this submission.

Respectfully submitted,

/s/ Vivian Rivera Drohan
Vivian Rivera Drohan, Esq.

cc: Irina Roller, Esq. (via ECF)

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